

I have been an amateur radio operator for 33 years and hold the Extra Class License, Callsign K2PG. In RM-10352, the Petitioners seek a rulemaking to impose bandwidth-specific subbands in the 160 meter amateur band (1800-2000 kHz). Historically, amateur radio operators have relied on voluntary bandplans in this band while laboring under FCC-mandated subband allocations on other bands. RM-10352 seeks to extend the overregulation of a hobby radio service for no good reason. The United States is the only country in the world in which the government still sets up bandplans on amateur radio bands by establishing mode-specific or bandwidth-specific subbands. While amateur radio operators in other countries can freely change the ways in which they use their bands as operating habits and practices change, American amateur radio operators are hampered by a straitjacket of regulations. On the 75 / 80, 40, 20, 17, 15, 12, and 10 meter bands (3500-4000 kHz, 7000-7300 kHz, 14.0-14.35 MHz, 18.068-18.168 MHz, 21.0-21.45 MHz, 24.89-24.99 MHz, and 28.0-29.7 MHz, respectively), there are de facto "American-free" zones where foreign amateurs may use voice and image modes but Americans are limited to non-voice modes by FCC regulations. We do not need to ossify the bandplan on 160 meters in the same manner; in fact, we should abolish the FCC-mandated emission subbands by deleting Section 97.305 (c) of the Rules.

I therefore conclude that RM-10352 should be DENIED.

Respectfully submitted,
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